

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 04-41 Erie
	)	
PAMELA DOLORES BARNETT	)	Electronically Filed

**MOTION TO CONTINUE SENTENCING DATE**

AND NOW, comes the above-named defendant, PAMELA DOLORES BARNETT, by and through her attorney, PATRICIA A. AMBROSE, PH.D., J.D., and respectfully files the following Motion to Continue Sentencing Date, and in support thereof states as follows:

1. The defendant is charged by federal indictment at the above-term and number with one count of conspiracy to defraud the United States (18 U.S.C. §371) and one count of mail fraud (18 U.S.C. §1341).
2. On June 23, 2005, Pamela Dolores Barnett entered a guilty plea from a negotiated plea agreement to Count I of the indictment, charging her with violating 18 U.S.C. §371.
3. Sentencing in this case was scheduled for October 5, 2005 at 11:00 a.m.
4. Defense counsel is to undergo a series of tests during that week in Pittsburgh and will be unavailable at that time.
5. Assistant United States Attorney for the Western District of Pennsylvania, Christian Trabold, has no objections to a continuance of the sentencing in this case.
6. Additionally, Pamela Dolores Barnett has no objections to a continuance of the sentencing date in this case.

WHEREFORE, the defendant respectfully requests that the Court enter an Order continuing her sentencing date which was originally scheduled for October 5, 2005.

Respectfully submitted,

s/Patricia A. Ambrose

Patricia A. Ambrose, Ph.D., J.D.

Attorney for Defendant

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Supreme Court I.D. # 77651